

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

IN RE PORK ANTITRUST
LITIGATION

Civil No. 18-1776 (JRT/HB)

This Document Relates to:

All Consumer Indirect Purchaser Actions

**STIPULATION OF CONSENT FOR LEAVE TO FILE
CONSUMER INDIRECT PURCHASER PLAINTIFFS'
THIRD CONSOLIDATED AMENDED CLASS ACTION COMPLAINT**

Pursuant to Federal Rule of Civil Procedure 15(a)(2), Consumer Indirect Purchaser Plaintiffs (“CIPPs”) and Defendants (the “Parties”) hereby stipulate and agree, subject to the approval and order of this Court as follows:¹

1. CIPPs may file their Third Consolidated Amended Class Action Complaint (“TAC”) - attached as follows:

EXHIBIT A: SEALED Proposed Redlined Complaint (without Exhibits);

EXHIBIT B: SEALED Proposed Clean Complaint (with Exhibits);

EXHIBIT C: REDACTED Proposed Redlined Complaint (without Exhibits);

EXHIBIT D: REDACTED Proposed Clean Complaint (with Exhibits)

In accordance with the Court’s October 20, 2020 order, the TAC removes certain state law claims and Indiana Packers as a Defendant. The TAC also substitutes five new named plaintiffs— Debbie Boyko (Florida), Pam Petersen (Nebraska), Stacy Troupe (California), James Eaton (Kansas), and Isabelle Bell (Tennessee)—for individuals who are no longer willing to serve as class representatives.

2. Defendants hereby consent to the Court granting CIPPs leave to file the Third Amended Class Action Complaint, attached as Exhibit B.
3. The Parties further stipulate that Defendants are not required to answer the TAC, and that all admissions and denials as to factual allegations and all affirmative defenses in Defendants’ prior answers to the Second Amended Complaint remain operative.

¹ JBS takes no position on the amendment.

DATED: June 1, 2021

Respectfully submitted,

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